

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Erica López Prater, Ph.D., ) Court File No. 23-CV-505 (KMM-DJF)  
Plaintiff, )  
v. )  
Trustees of the Hamline University of )  
Minnesota, )  
Defendant. )  
\_\_\_\_\_  
) ) **DEFENDANT'S MOTION TO**  
 ) **DISMISS PLAINTIFF'S**  
 ) **COMPLAINT**  
)

Defendant Trustees of the Hamline University of Minnesota ("Defendant") respectfully move the Court for an Order dismissing Plaintiff's Complaint based on the Memorandum of Law in Support of Motion to Dismiss Plaintiff's Complaint and the Declaration of Mark T. Berhow.

This motion is based on the Complaint, the Memoranda of Law and other motion submissions filed by Defendant in accordance with Local Rule 7.1, all the files, records and proceedings herein, such evidence and argument as may be presented to the Court prior to a decision on this motion, and all matters of which the Court may or must take judicial notice.

Dated: March 9, 2023

HINSHAW & CULBERTSON LLP

By: *s/Mark T. Berhow*  
Mark T. Berhow, Reg. No. 031450X  
Kevin R. Coan, Reg. No. 29357X  
250 Nicollet Mall, Suite 1150  
Minneapolis, MN 55401

Telephone: 612-333-3434  
Fax: 612-334-8888  
[mberhow@hinshawlaw.com](mailto:mberhow@hinshawlaw.com)  
[kcoan@hinshawlaw.com](mailto:kcoan@hinshawlaw.com)

*Attorneys for Defendant Trustees of the  
Hamline University of Minnesota*